



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
RCRA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose: RCRA Compliance Evaluation Inspection

Facility: Highland Plating Company

Location: 1001 No. Orange Drive
Los Angeles, California 90038

EPA ID Number: CAD 008 292 153

Date of Inspection: October 7, 2011

EPA Representatives: Jennifer Downey
Enforcement Officer
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Facility Representatives: Max Faeth
President/Owner

Dimas Alamilla
Pollution Control Supervisor\

Martin Zamora
Production Manager

Report Prepared By: Jennifer Downey

A handwritten signature in purple ink, appearing to read "Jennifer Downey", is written over a horizontal line.

Report Date: January 10, 2012

Introduction

On October 7, 2011, a representative of the U.S. Environmental Protection Agency (EPA) conducted an unannounced compliance evaluation inspection (CEI) of Highland Plating Co. (Highland) in Los Angeles, California. The purpose of the inspection was to determine Highland's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, and the California Code Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

The inspector conducted a physical inspection of the facility and reviewed records related to Highland's hazardous waste management practices. This inspection report summarizes the events that transpired during the inspection and observations made by the inspector.

Facility Background

Facility Name	Highland Plating Co.
Company Web-Site	www.highlandplating.com
Site History	Highland has been in business for approximately 50 years and at this location since 1980.
Number of Employees	Approximately 54 employees
Link to Facility Aerial Photograph	http://maps.google.com/maps?f=q&source=s_q&hl=en&geocode=&q=1001+n.+orange+dr.,+los+angeles&sll=37.0625,-95.677068&sspn=30.268266,56.513672&ie=UTF8&hq=&hnear=1001+N+Orange+Dr.,+Los+Angeles,+California+90038&ll=34.089066,-118.342217&spn=0.000964,0.001725&t=h&z=19
Hours of Operation	2 shifts, 6:00 a.m. to 2:00 p.m. and 2:00 p.m. to 8 p.m. Monday through Thursday. 1 shift on Fridays from 6:00 a.m. to 2:00 p.m.
Filed Notification of Hazardous Waste Activity	August 19, 1980
Facility Processes	Highland is metal finishing business offering plating and anodizing services for various customers primarily in the aerospace, electronics, automotive, medical and goods manufacturing industries. Highland provides nickel, gold, copper, brass and chrome plating services.
Wastes Streams	Filter cake (F006) from the treatment of spent plating solutions and rinse waters, chrome bearing wastes (D007), cyanide wastes from plating operations (F007, F008), polishing dust (D007, D008), nitric and sulfuric acid wastes (D002), cadmium wastes (D006), paint related wastes (D001), waste acetone (F003, D001), lead bearing wastes (D008), and universal waste lamps.
Generator Status	Large Quantity Generator (LQG)
Compliance History	EPA last inspected Highland on October 23, 2009. Violations observed during the inspection included storage of hazardous waste over 90 days, open containers, improperly labeled containers, universal waste violations and training violations. A consent agreement/final order (CAFO) was filed on July 14, 2010 as part of which Highland paid a fine of \$7,500 and agreed to submit biannual compliance reports for a 2-year period.

Facility Inspection

The inspector was given a tour of the facility by Mr. Dimas Alamilla and Mr. Martin Zamora. The following areas were inspected:

1. Section 1: Anodizing Department
2. Section 2: Nickel/Chrome Department
3. Section 3: Nickel/Chrome/Brass/Gold Department
4. Wastewater Treatment/Pollution Control Area
5. Hazardous Waste Storage Area
6. Shipping Area
7. Paint Department
8. Gold Plating Room

1. Section 1: Anodizing Department

The Plating Lines Section 1 is where parts are racked, cleaned, etched, deoxidized, anodized, rinsed and air dried. The inspectors observed approximately nineteen 700-gallon tanks in the area. No potential violations were identified in Section 1.

The facility's sump system for plating wastes runs throughout Sections 1 – 3. There are three separate sumps for chrome, alkaline and cyanide rinse wastes. The sumps are cleaned out weekly and waste is pumped directly to holding tanks in the Wastewater Treatment/Pollution Control Area. The sumps are lined with fiberglass and appeared to be reasonably clean and in good condition at the time of the inspection.

2. Section 2: Nickel/Chrome Department

Section 2 is where parts cleaning and nickel, chrome, and copper plating operations take place. The inspector observed approximately fifteen tanks of various sizes, the largest being 700-gallon tanks. No potential violations were identified in Section 2.

3. Section 3: Nickel/Chrome/Brass/Department

Section 3 is where copper, brass, nickel, and chrome plating operations take place. No potential violations were identified in the Section 3.

4. Wastewater Treatment/Pollution Control Area

The wastewater treatment system is used to treat wastewater generated from plating activities. The facility utilizes a 2-stage cyanide destruct system to treat rinse water containing copper cyanide and brass. Wastewater goes through a neutralization and clarification process before being sent through a filter press and then to a sludge dryer, which is permitted under the facility's

tiered permit issued by the State. Treated water is discharged to the sewer system in accordance with the facilities' wastewater treatment permit and the sludge is deposited in cardboard cubic yard boxes.

The inspector observed 2 supersack containers of filter cake (F006 waste) in the Wastewater Treatment Area. The first container was under the filter press and was open because waste was being added to the container. The container was labeled as required and dated 10/4/11. The second container was in the adjacent 90-day hazardous waste storage area. It was closed, labeled with all of the required information and dated 8/16/11.

Also in the immediate area the inspector noted 2 open containers (Photo 1 and 2). The containers were fashioned from a 55-gallon drum that had been split in half. According to facility representatives the containers contained caustic etch from a scrubber in the anodizing line that was in the process of being cleaned out. The containers were open and unlabeled. A small amount of caustic etch could be seen on the floor and a wooden pallet next to the container (Photo 2).

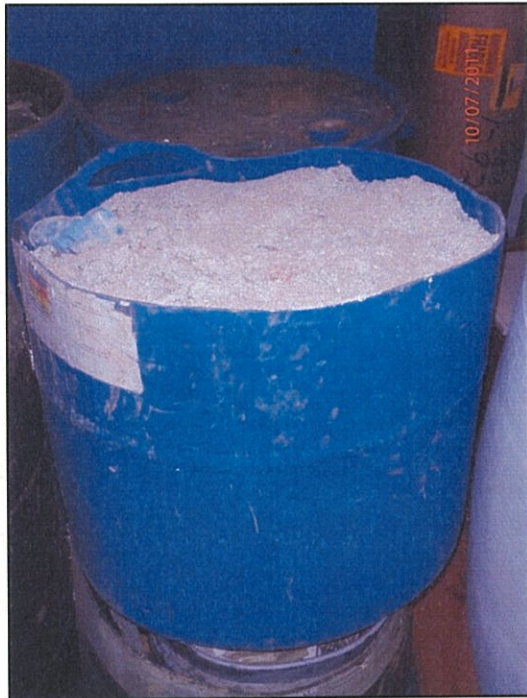


Photo 1: Open container of caustic etch

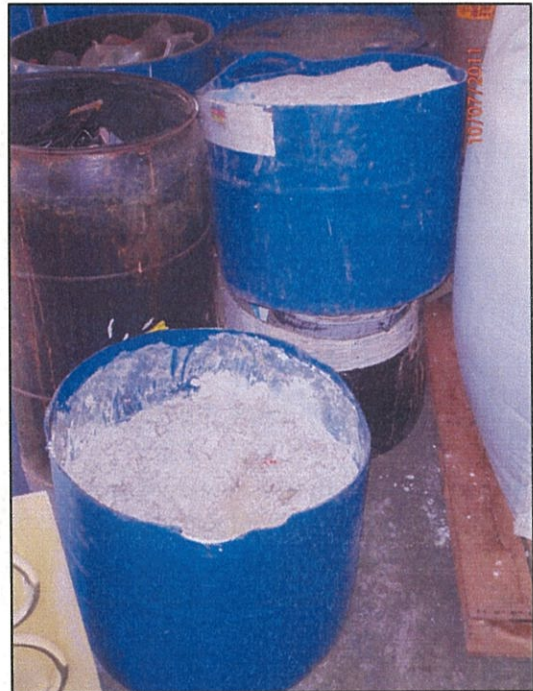


Photo 2: Both containers of caustic etch

An eyewash and fire extinguisher were located in/near the 90-day hazardous waste storage in the Wastewater Treatment Area.

5. Hazardous Waste Storage/Transfer Area

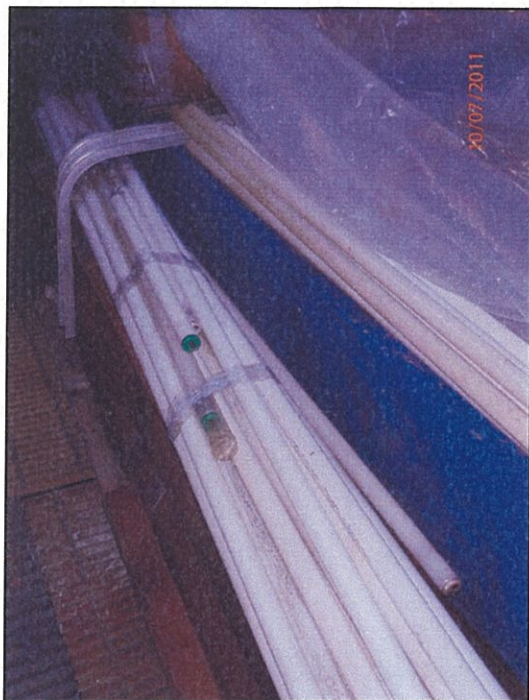


Photo 3: Used fluorescent lamps

The inspector noted used fluorescent lamps in the Hazardous Waste Storage/Transfer Area that had been taped together into bundles (Photo 3). The lamps were not properly containerized, were not marked with the words “universal waste – lamps” and were not dated.

Also in the Hazardous Waste Storage/Transfer Area the inspector observed 2 cardboard and 1 plastic cubic yard tote containers. The 3 containers were closed and labeled with the required information. However, the plastic container holding chromic acid hazardous waste (D002, D007) was dated 6/4/11 which is over the 90-day hazardous waste storage limit for LQGs (Photo 4).

A photograph of a yellow hazardous waste label from the California Department of Toxic Substances Control. The label contains handwritten information: NAME: HIGHLAND, ADDRESS: 1001 N. BRIDGE, CITY: LA, STATE: CA, ZIP: 90033, WASTE NO: 792, ACCUMULATION START DATE: 06-4-11, and CONTENTS COMPOSITION: CHROMIC ACID / SULFURIC ACID. A red arrow points to the accumulation start date.

Photo 4: Container over 90-day storage limit

6. Shipping Area

No hazardous waste was observed in the Shipping Area at the time of the inspection and no potential violations were noted.

7. Paint Department

Outside of one of the two booths in the Paint Department the inspector observed a 55-gallon metal drum/satellite accumulation container of waste acetone. A funnel with a locking mechanism was attached to the top of the drum but dirty rags and paint debris had been stuffed inside the funnel so that it was not fully closed as required (Photo 5). The drum was labeled with all the required information and was dated 7/25/11.

Also in the Paint Department the inspector observed a step-can/satellite accumulation container filled with acetone soaked rags and paint debris (Photo 6). The container was not labeled as hazardous waste and did not have an accumulation start date as required.



Photo 5: Open container of waste acetone

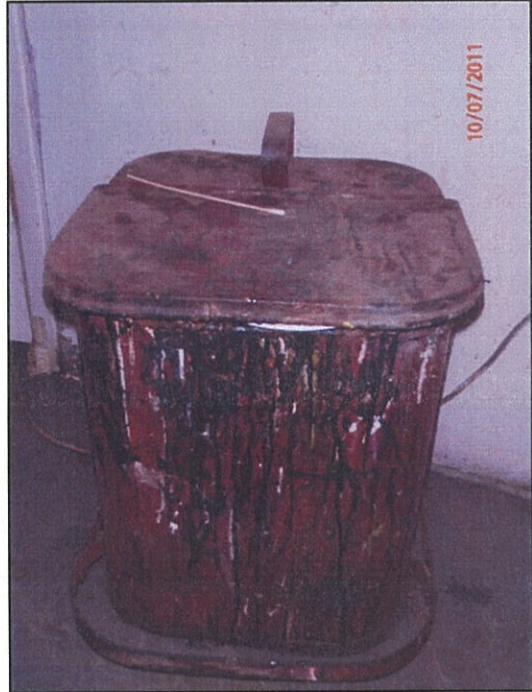


Photo 6: Unlabeled hazardous waste step can

8. Gold Plating

No hazardous waste was observed in the Gold Plating area at the time of the inspection and no potential violations were noted.

Record Review

The inspector reviewed hazardous waste manifests from 2009 – 2011, land disposal notification forms, and recent training records. No potential violations were noted during the record review.

Area of Concern

In the Wastewater Treatment/Pollution Control Area the inspector observed 2 open containers (55 gallon poly split in half) contained caustic etch from a scrubber in the anodizing line that was in the process of being cleaned out. The containers were open and unlabeled. A small amount of caustic etch could be seen on the floor and a wooden pallet next to the container. The inspector did not observe anyone actively adding or removing waste from the containers and cautioned facility representatives that the containers needed to be closed, the spilled waste needed to be cleaned up, and a hazardous waste label with all the required information needed to be affixed to both containers before the end of the day. Subsequent to the inspection Highland provided evidence that the area had been cleaned up and the caustic etch had been transferred to a tote container which was kept closed and properly labeled until it was manifested offsite.

POTENTIAL VIOLATIONS
of
California Title 22 CCR and RCRA 40 CFR
Hazardous Waste Management Regulations

1. Storage of RCRA Hazardous Waste without a Permit

22 CCR § 66262.34 (40 CFR § 262.34) states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that certain conditions are met. Failure to meet the conditions of the exemption subjects the generator to the permitting requirements at 22 CCR § 66270.1 [40 CFR § 270.1].

Finding: In the Hazardous Waste Storage/Transfer Area the inspector observed a plastic tote container holding chromic acid hazardous waste (D002, D007). The accumulation start date on the container was marked 6/4/11, which is 35 days over the 90-day hazardous waste storage limit for LQGs. According to facility representatives the tote should have been manifested offsite with their last shipment of hazardous waste the previous month.

Facility Response: Highland provided evidence that the container was manifested offsite on October 18, 2011.

Follow-up: Highland must submit a written standard operating procedure to ensure that weekly inspections of all 90-day hazardous waste storage areas are being thoroughly conducted and logged to prevent hazardous waste containers from being overlooked.

2. Failure to Properly Label Hazardous Waste Containers in Satellite Accumulation Area

A generator may accumulate as much as 55-gallons of hazardous waste at or near any point of generation provided that the container is marked/labeled with the words "Hazardous Waste" and the accumulation start date. Additionally California regulations require that the satellite accumulation container also be marked with the composition and physical state of the waste, a statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable), and the name and address of the generator. 22 CCR § 66262.34(e)(1) [40 CFR § 262.34(c)(1)]

Finding: In the Paint Department the inspector observed a step can filled with acetone soaked rags and paint debris which was not labeled as hazardous waste and did not have an accumulation start date as required.

Facility Response: On November 1, 2011 Highland provided photographic evidence that a hazardous waste label with all the required information had been affixed to the container.

3. Failure to Properly Close Hazardous Waste Containers

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove the waste. 22 CCR § 66262.34(a)(1)(A); 66265.173(a) [40 CFR § 262.34(a)(1)(i); 265.173(a)].

Finding: In the Paint Department the inspector observed that a funnel attached to a 55-gallon metal drum of waste acetone had been stuffed with dirty rags and paint debris so that the lid of the funnel was not fully closed/latched as required.

Facility Response: Highland provided photographic evidence showing that the debris had been cleaned out of the funnel and that the lid was latched.

Follow-up: Highland must submit a written standard operating procedure to ensure that facility personnel put dirty rags and paint debris in the step and ensure that the funnel to the waste acetone container remains closed except when adding or removing waste.

4. Failure to Properly Manage Universal Waste

A universal waste handler must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. 22 CCR § 66273.34(b); 66273.34(c) [40 CFR § 273.13(d); 273.14(e)]

Finding: The inspector noted that used fluorescent lamps in the Hazardous Waste Storage/Transfer Area had been taped together into bundles. The lamps were not properly boxed/containerized and were not marked with the words “universal waste – lamps”. It also was not clear how long the lamps had been there.

Facility Response: Highland provided evidence that the used lamps had been sent offsite for recycling.

Follow-up: Subsequent to the October 23, 2009 inspection, Highland submitted a written standard operating procedure for managing used lamps generated at the facility and certified that facility personnel with universal waste duties received training on how to properly manage the lamps. Highland must provide evidence that facility personnel with universal waste duties have been trained/re-trained and that Highland will ensure that the standards operating procedures are being consistently followed.

Attachment

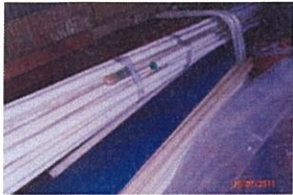
Photograph Log

ATTACHMENT 1

Photograph Log for EPA's October 7, 2011 Highland Plating Co. RCRA Inspection

All photographs on this log except as identified below were taken with an Olympus Tough TG-310 by Jennifer Downey, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number listed below begins with "PA0700" and that the photograph log starts with photograph number 53.

- 53. Hazardous waste label on supersack of F006 waste dated 10/4/11
- 54. Hazardous waste label on supersack of F006 waste dated 8/16/11
- 55. Overview shot of supersack in Photo 54
- 56. Open & unlabeled container of hazardous waste from recent scrubber cleanout
- 57. Overview shot of both open & unlabeled containers of hazardous waste from recent scrubber cleanout
- 58. Bundle of used fluorescent lamps in hazardous waste storage area
- 59. Another shot of the bundle of used fluorescent lamps
- 60. Hazardous waste label on tote container of chromic acid waste dated 6/4/11
- 61. 55-gallon metal drum of waste acetone in paint booth area – lid to funnel not fully closed
- 62. Close-up of funnel on 55-gallon drum in Photo 61 and dirty rags on top of drum
- 63. Hazardous waste label on drum in Photo 61 and 62
- 64. Step can filled with dirty rags and paint debris
- 65. Contents of step can in Photo 64



ENFORCEMENT CONFIDENTIAL
EXPEDITED SETTLEMENT PROPOSAL
Highland Plating Co./EPA ID# CAD 008 292 153

Step 1. Determination of Eligibility

	Yes	No
Has this facility been a SNC (or a repeat violator for the same violations) in the last five years? Confirm via a RCRAInfo search.	X	
Do any violations involve illegal disposal or illegal treatment?		x
Do any violations involve nationally significant issues? (See Rosemarie Kelly memo dated Oct 29, 2009)		x
Do the violations involve shipping HW to a non-authorized facility?		x
Is there an actual or threatened release or substantial threat of environmental harm?		x
Is the facility a TSD?		x

If the answer is **yes** to any of the above questions, the facility is **not eligible** for an expedited settlement.

	Yes	No
Are the violations easily corrected?	x	

If the answer is **no**, the facility is **not eligible**.

Step 2. Identifying Violations

Violation	Observed (check)	Eligible	Not eligible
Labeling violations	X	X	
Dating violations	X	X	
Open containers	X	X	
Storage of hazardous waste for no more than 30 days OVER the allowed time (i.e., 121 days for LQGs = not eligible)		X	
Minor deficiencies in contingency plan (for LQGs) or emergency postings (SQGs)		X	
Used oil violations, not including releases		X	
Universal waste label violations	X	X	
Containers in poor condition			X
Training violations			X
Failure to make a waste determination			X
Tank subpart J violations			X
AA, BB, CC violations			X
Failure to submit a BRS			X
Failure to maintain the facility to prevent releases			X
Lack of aisle space			X
Failure to have emergency equipment			X
Failure to conduct weekly inspections			X
Other not on above list (specify): 4 manifests missing TSD signature			X

If you observed **ANY** violations marked not eligible or not on the above list, the facility is **not eligible** for an expedited settlement.

3. Determine Penalty

Run Dun & Bradstreet. Determine whether facility is a non-profit or small business as defined by the Small Business Act. See: <http://www.sba.gov/content/determining-business-size>

Small Business Facility Violations	Penalty	Multiplier (number of individual violations, i.e., # of drums)	Total
Labeling violations	\$350		
Dating violations	\$350		
Open containers	\$350		
Storage of hazardous waste for no more than 30 days OVER the allowed time (i.e., 121 days for LQGs = not eligible)	\$350		
Minor deficiencies in contingency plan (for LQGs) or emergency postings (SQGs)	\$350		
Used oil violations, not including releases	\$350		
Universal waste lamp violations	\$350		
TOTAL			

or

Non-small Business Facility Violations	Penalty	Multiplier (number of individual violations, i.e., # of drums)	Total
Labeling violations	\$750	2	
Dating violations	\$750		
Open containers	\$750	2	
Storage of hazardous waste for no more than 30 days OVER the allowed time (i.e., 121 days for LQGs = not eligible)	\$750		
Deficiencies in contingency plan (for LQGs) or emergency postings (SQGs)	\$750	1	
Used oil violations, not including releases	\$750		
Universal waste lamp violations	\$750	1	
Training	\$750	1	
Emergency equipment	\$750	1	
Manifest requirements	\$750	1	
TOTAL			


Penalty cap is \$10,000. If the penalty is greater than \$10,000, the facility is **not eligible** for an Expedited Settlement.

Economic Benefit Calculation	
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If the economic benefit is calculated to be greater than \$3000, the facility is **not eligible**.

Highland Plating was designated a SNC in October 2009 and returned to compliance in June of 2010 and therefore is not eligible for an expedited settlement.

Offer of Expedited Settlement
Approved/Disapproved:



Manager, RCRA Enforcement Office